## IN THE UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MISSOURI EASTERN DIVISION

MALEEHA AHMAD, et al.,	)	
Plaintiffs,	)	
v.	)	No. 4:17-cv-2455 CDF
CITY OF ST. LOUIS, MISSOURI,	)	
Defendant.	)	

## JOINT MOTION FOR PROTECTIVE ORDER

The parties respectfully request this Court enter the attached proposed protective order.

On March 18, 2019, Plaintiffs served subpoenas to produce documents upon the respective custodian of records for the Missouri Highway Patrol and Governor's Office.

To facilitate the production of documents responsive to the subpoenas, the custodians of records, represented by the Missouri Attorney General, have requested entry of a limited protective order. After negotiations, the parties and Attorney General agree that the proposed protective order is appropriate to protect the security and privacy interests of the subpoena recipients and the individuals named in responsive documents.

Accordingly, the parties request this Court enter the attached proposed protective order.

## Respectfully submitted,

## /s/ Anthony E. Rothert

Anthony E. Rothert, #44827MO Jessie Steffan, #64861MO ACLU of Missouri Foundation 906 Olive Street, Suite 1130 St. Louis, Missouri 63101 (314) 652-3114 arothert@aclu-mo.org jsteffan@aclu-mo.org

Gillian R. Wilcox, #61278MO 406 West 34th Street, Suite 420 Kansas City, Missouri 64111 ACLU of Missouri Foundation (816) 470-9938 gwilcox@aclu-mo.org Attorneys for Plaintiffs /s/ Robert H. Dierker Robert H. Dierker, #23671MO Associate City Counselor City Hall 1200 Market Street, Room 314 St. Louis, MO 63103 Tel: (314) 622-3361 Fax: (314) 622-4956

dierkerr@stlouis-mo.gov

Attorney for Defendant